UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ELIZABETH BRANDENBURG a/k/a

MOTHER FOTEINI, MARIA KALLIS a/k/a SISTER THEONYMPHI,

Plaintiffs,

-against-

GREEK ORTHODOX ARCHDIOCESE OF NORTH AMERICA, GERASIMOS MAKRIS a/k/a FATHER GERASIMOS MAKRIS, DEMETRIOS TRAKATELLIS a/k/a ARCHBISHOP DEMETRIOS, ALLEN PAROPOULOS a/k/a BISHOP ANDONIOS, AND CHARLENE ASQUITH a/k/a MOTHER EISODIA,

Defendants.

Civil Action No.: 1:20 Civ. 03809-JMF

Hon. Jesse M. Furman

DEFENDANTS' NOTICE OF MOTION FOR SUMMARY JUDGMENT

ORAL ARGUMENT REQUESTED

DI ELGE GLAZE NOTICE (1)

PLEASE TAKE NOTICE that upon the accompanying Declaration of Karen Y. Bitar, with Exhibits A through Q annexed thereto; Defendants' Memorandum of Law in Support of Their Motion for Summary Judgment; Defendants' Local Rule 56.1 Statement of Undisputed Material Facts; and upon all pleadings and proceedings herein, the undersigned, attorneys for Defendants Greek Orthodox Archdiocese of North America, Gerasimos Makris a/k/a Father Gerasimos Makris, Demetrios Trakatellis a/k/a Archbishop Demetrios, Allen Paropoulos a/k/a Bishop Andonios, and Charlene Asquith a/k/a Mother Eisodia will move the Honorable Jesse M. Furman, United States District Judge, for an order: (i) granting Defendants' motion for summary judgment in its entirety pursuant to Rule 56 of the Federal Rules of Civil Procedure; and (ii) dismissing Plaintiffs' Second Amended Complaint with prejudice; and (iii) granting such other and further relief as the Court may deem just and proper.

X

X

Dated: New York, New York July 22, 2022

Respectfully submitted,

SEYFARTH SHAW LLP

By: /s/ Gerald L. Maatman, Jr.

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NORTH AMERICA, GERASIMOS MAKRIS
a/k/a FATHER GERASIMOS MAKRIS,
DEMETRIOS TRAKATELLIS a/k/a
ARCHBISHOP DEMETRIOS, ALLEN
PAROPOULOS a/k/a BISHOP ANDONIOS,
AND CHARLENE ASQUITH a/k/a
MOTHER EISODIA